

# EXHIBIT B

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 UBER TECHNOLOGIES, INC.;  
 RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF GREG BROWN  
 SUPPORTING DEFENDANTS' MOTION  
 FOR SANCTIONS AGAINST BRET  
 STANLEY**

\_\_\_\_\_  
 This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros  
 Courtroom: G-15th Floor

1 I, Greg Brown, declare under penalty of perjury as follows:

2 1. I am Director, Head of Central Safety at Uber Technologies Inc. (“Uber”), a Defendant  
3 in the above captioned matter. Between 2014 and 2020, I was employed by Uber as “Operations and  
4 Logistics Manager,” “Senior Operations Manager, Program Lead,” “Safety and Senior Program Lead,  
5 Safety & Risk.” When I returned to Uber in 2022, I initially worked as Director of Safety, United  
6 States & Canada. Since August 2024, I have served in my current Director role where my  
7 responsibilities include overseeing, organizing, and implementing global risk programs.

8 2. I have personal knowledge of the statements set forth in this Declaration and could  
9 competently testify to the same if called to do so.

10 3. I have reviewed UBER\_JCCP\_MDL\_003941399, titled “INA-4142 | [REDACTED]  
11 VFB Logistic Flow List to Audit” (“VFB Analysis”) and its metadata. The VFB Analysis was created  
12 on May 5, 2023 and I understand was produced by Uber in this litigation from my custodial file on  
13 March 28, 2025.

14 4. The VFB Analysis is a [REDACTED]  
15 [REDACTED]  
16 [REDACTED] he  
17 VFB Analysis is central to developing Defendants’ proprietary method for identifying potential fraud  
18 and unauthorized conduct on the Uber Eats platform;<sup>1</sup> and improving the safety of the Uber Eats  
19 platform and by [REDACTED]. Defendants’ step-by-step  
20 methodology for their proprietary analysis of this type of information—which is competitively  
21 sensitive—is expressly set out in the VFB Analysis.

22 5. Access to the VFB Analysis was restricted within Uber by role and responsibility, and  
23 is not broadly shared within the Uber organization. The details of the VFB Analysis are unknown to  
24 Uber’s competitors and application users, and the disclosure of this information would result in a  
25 competitive disadvantage to Uber and would also erode the efficacy of Uber’s audit process designed  
26 to [REDACTED].

27  
28 <sup>1</sup> The VFB Analysis does not relate to trips on the Uber Rideshare platform.

